

From: [John Hebert](#)  
To: [Dan Peacock](#)  
Cc: [Russell Wasem](#); [Bill Jacobs](#); [Jennifer Gaines](#); [Laura Parsons](#); [David Stangel](#)  
Subject: Re: Fw: Rodent baiting  
Date: 12/20/2011 01:28 PM

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This question has been answered on the the Labeling Consistency Committee Q's and A's:

[http://www.epa.gov/pesticides/regulating/labels/labels\\_faq/lr\\_faq\\_20.html](http://www.epa.gov/pesticides/regulating/labels/labels_faq/lr_faq_20.html)

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John Hebert, PM7  
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Registration Division  
Office of Pesticide Programs  
703-308-6249

▼ [Dan Peacock---12/19/2011 11:14:37 AM---Rus, This is an old question regarding "Service Containers"](#).

From: Dan Peacock/DC/USEPA/US  
To: Russell Wasem/DC/USEPA/US@EPA  
Cc: Bill Jacobs/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, John Hebert/DC/USEPA/US@EPA, Laura Parsons/DC/USEPA/US@EPA, David Stangel/DC/USEPA/US@EPA  
Date: 12/19/2011 11:14 AM  
Subject: Re: Fw: Rodent baiting

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Rus,

This is an old question regarding "Service Containers".  
I am sure that enforcement has some well thought out guidance on this topic.  
However, it has been so long since the question has arisen, I will check with Dave Stangel (via this E-Mail) first, and he can reply to everyone.

Thank You,

Daniel B. Peacock, Biologist  
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▼ Russell Wasem---12/19/2011 11:03:07 AM---Is it cool for PCOs to have their own smaller container (<16lb)of rodent bait that they take to the

From: Russell Wasem/DC/USEPA/US  
To: John Hebert/DC/USEPA/US@EPA, Dan Peacock/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA  
Cc: Laura Parsons/DC/USEPA/US@EPA  
Date: 12/19/2011 11:03 AM  
Subject: Fw: Rodent baiting

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Is it cool for PCOs to have their own smaller container (<16lb)of rodent bait that they take to the use site for their own use? If they aren't selling smaller containers of it, I cannot think of a reason why this isn't permissible. Can anyone else?

----- Forwarded by Russell Wasem/DC/USEPA/US on 12/19/2011 09:52 AM -----

From: "Suomi, Dan (AGR)" <DSuomi@agr.wa.gov>  
To: Russell Wasem/DC/USEPA/US@EPA  
Date: 12/15/2011 04:23 PM  
Subject: Rodent baiting

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Hello Rusty - do the new guidelines disallow the transfer of rodent bait from a larger (e.g., 16 lb container for PCOs) to a smaller container even if the PCO places a label on the smaller container? The question has been proposed from several companies in Washington and they would like to carry the bait in a smaller container.

Thanks.

Dan Suomi  
Washington State Department of Agriculture